

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JUN 2 6 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8763 RETURN RECEIPT REQUESTED

Mr. Stephen Wasko Plant Manager PVS Technologies Incorporated 10825 Harper Avenue Detroit, Michigan 48213

> Re: Notice of Violation Compliance Evaluation Inspection MID985621804

Dear Mr. Wasko:

On March 23, 2015 a representative of the U.S. Environmental Protection Agency inspected the PVS Technologies, Inc., facility located in Detroit, Michigan (hereinafter "PVS" or "you"). As a large quantity generator of hazardous waste, PVS is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* ("RCRA"). The purpose of the inspection was to evaluate PVS' compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by PVS, EPA's review of records, and the inspector's observations, EPA has determined that PVS has unlawfully stored hazardous waste without a license or interim status as a result of PVS' failure to comply with certain conditions for a license exemption under Mich. Admin. Code R. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which PVS was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code R. 299.9601(1)-(3) and 299.11003(1)(p) and (q), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 2 and 3 are

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also independent TSD requirements incorporated from Mich. Admin. Code R. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, each failure of PVS to comply with these conditions is also a violation of the corresponding requirements in Mich. Admin. Code R. 299.9601(1)-(3) and 299.11003(1)(p) and (q) [40 C.F.R. Part 265] or Mich. Admin. Code R. 299.9601(1) and (2) and 299.11003(1)(m)-(o) [40 C.F.R. Part 264].

Finally, EPA has determined that PVS violated RCRA requirements related to hazardous waste determinations and universal waste, as described in paragraphs 4 and 5, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, PVS was out of compliance with the following large quantity generator license exemption conditions:

1. Hazardous Waste Container Labeling

Under Mich. Admin. Code R. 299.9306(2) [40 C.F.R. § 262.34(c)(1)(ii)] a large quantity generator must label or clearly mark each hazardous waste satellite accumulation container with the words "Hazardous Waste." In the State of Michigan, it is further required that containers accumulating hazardous waste must also be labeled or marked with the hazardous waste number (code) of the waste.

At the time of the inspection, a steel 55-gallon drum accumulating hazardous waste aerosol cans in PVS' 90-day hazardous storage area was not labeled with the words "Hazardous Waste" and was not marked with the applicable hazardous waste number (code). Manifests reviewed after the inspection indicate that PVS manages its waste aerosol cans as D001 hazardous waste.

The license exemption conditions identified below in paragraphs 2 and 3 are also independent TSD requirements violated by PVS:

2. Contingency Plan Content – Emergency Equipment Details

Under Mich. Admin. Code R. 299.9306(1)(d); 40 C.F.R. Subpart D [40 C.F.R. §§ 262.34(a)(4); 265.52(e)] a large quantity generator must have a hazardous waste contingency plan which includes a current list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment). The list must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

At the time of inspection, PVS maintained an integrated emergency response plan (ERP) that contained the provisions necessary in a hazardous waste contingency plan. Appendix C of the ERP contained a list of emergency equipment on site and its location, but the list did not contain a physical description of the emergency equipment or a brief outline of its capabilities.

3. Waste Storage Area Inspection Logs

Under Mich. Admin. Code R. 299.9306(1)(a)(i) [40 C.F.R. §§ 262.34(a)(1)(i); 265.174] a large quantity generator must inspect, at least weekly, the area(s) in which hazardous waste containers are stored. In the State of Michigan, it is further required that records of these inspections must be maintained for a period of not less than 3 years from the date of the inspection.

At the time of the inspection, PVS indicated it had been conducting inspections, at least weekly, of its hazardous waste container storage area but had not been maintaining records of these inspections as required above.

Summary: By failing to comply with the conditions for a license exemption, above, PVS became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. PVS failed to apply for such a license. PVS' failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code R. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code R. 299.9601(1)-(3) and 299.11003(1)(p) and (q) is also an independent violation of the corresponding TSD requirement.

OTHER VIOLATIONS

PVS also violated the following generator requirements:

4. Hazardous Waste Determination

Under Mich. Admin. Code R. 299.9302(1) [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous by using the following methods: (a) determine if the waste is excluded from regulation under rule Mich. Admin. Code R. 299.9204 [40 CFR § 261.4]; (b) determine if the waste is listed as a hazardous waste in rules Mich. Admin. Code R. 299.9213 and R. 299.9214 [Subpart D of 40 CFR § 261]; and (c) determine whether the waste is identified in rules Mich. Admin. Code R. 299.9212 [Subpart C of 40 CFR § 261] by testing the waste or applying knowledge of the waste in light of the materials used. *See* Mich. Admin. Code R. 299.9302(1) [40 CFR § 262.11(a)-(c)].

At the time of the inspection, PVS had not determined if the following waste streams in its waste storage area were hazardous: one 55-gallon drum of ferrous chloride and soda ash spill debris, one 5-gallon bucket of battery acid and soda ash spill debris, two 5-gallon buckets of oxidizer pad sump sludge, and two pallets containing several dozen 1-and 5-gallon containers of paints, synthetic coatings and other chemical products.

On April 7, 2015, PVS provided by email an analytical report for the oxidizer pad sump sludge which indicated the material is not a characteristic hazardous waste. However, PVS has not provided waste characterization information for the other waste streams listed above.

5. Universal Waste Requirements

Under Mich. Admin. Code R. 299.9228(4)(c)(ii) [40 C.F.R. § 273.13(d)(1)] a small quantity handler of universal waste must contain universal waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Furthermore, under Mich. Admin. Code R. 299.9228(4)(a) [40 C.F.R. §§ 273.15(a) and (c)(1)-(6)] a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste was generated. The handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated since the date it became a waste. The handler may make this demonstration by, among other things, labeling the container in which the universal waste accumulates with the earliest date that any universal waste in the container became a waste.

PVS is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

At the time of the inspection, PVS was storing universal waste lamps (bulbs) and battery packs in two small plastic crates in its waste storage area. The type of plastic crate storing universal waste bulbs did not have the ability to be closed or prevent breakage of the bulbs under reasonably foreseeable conditions. Additionally, one of the plastic crates was labeled with an accumulation start date of 2009, while the second crate did not have an accumulation start date. It was unclear when PVS began accumulating these universal wastes.

At this time, EPA is not requiring PVS to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1 through 3, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions for a license exemption and requirements for hazardous waste determinations and universal waste management. You should submit your response to Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,

Gary J. Victorine

RCRA Branch Chief

Enclosure

cc:

Jim Day, MDEQ (dayj@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)



U.S. ENVIRONMENTAL PROTECTION AGENCY Region 5, Land and Chemicals Division RCRA Branch, LR-8J 77 West Jackson Boulevard Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:

March 23, 2015

SITE NAME:

PVS Technologies, Inc.

ADDRESS:

10825 Harper Avenue

Detroit, Michigan 48213

EPA ID NUMBER:

MID985621804

GENERATOR STATUS:

Large Quantity Generator (2014)

NAICS CODE:

325188 All Other Basic Inorganic Chemical Manufacturing

FACILITY CONTACT:

Stephen Wasko

Plant Manager

EPA INSPECTOR:

Brian Kennedy

Environmental Engineer Compliance Section 2

RCRA Branch

Land and Chemicals Division

PREPARED BY:

Brian Kennedy

Date

APPROVED BY:

Julie Morris, Chief

Compliance Section 2

Date

5/14/15

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Purpose of Inspection

An unannounced Compliance Evaluation Inspection ("CEI") of PVS Technologies, Inc. (hereinafter "PVS" or "facility") located at 10825 Harper Avenue, Detroit, Michigan took place on March 23, 2015. The CEI was conducted by U.S. Environmental Protection Agency personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act ("RCRA") and its implementing regulations found in the Michigan Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of PVS' compliance with the regulations governing large quantity generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

Stephen Wasko - Plant Manager

PVS

Brian Kennedy - Environmental Engineer

U.S. EPA

Introduction

I arrived on site at 10:30 AM EST, introduced myself at the guard shack and requested to see the environmental coordinator. After signing in and watching a short safety video, I was introduced to Mr. Stephen Wasko, PVS' Plant Manager, who escorted me into the building for an opening conference. We proceeded to lunch room where I presented Mr. Wasko my enforcement officer credentials and business card and provided the Small Business Resources information and Pollution Prevention contact sheets. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a facility walk-through which would include photographs of hazardous waste storage areas, as well as a review of PVS records pertaining to hazardous waste.

I informed PVS of their right to make a confidential business information claim over the information and documents collected during the inspection.

Site Description

The following information about PVS is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

PVS specializes in producing ferric chloride solutions for potable water treatment and chemical etching, among other applications. From their website: "PVS Technologies is a premier manufacturer of high quality iron salts. Our liquid ferric chloride and liquid ferrous chloride are NSF-approved for use in potable water treatment. Ferric chloride is the chemical of choice for water and wastewater treatment for removal of turbidity, color, DBP precursors, solids, phosphorus, and sulfide odors. PVS also manufactures a line of high quality etchant grade ferric chloride solutions specifically engineered to your particular etchant needs." The facility was constructed in 1991.

PVS is a subsidiary of PVS Chemicals, Inc., which maintains its headquarters south of PVS across Harper Avenue. There are currently 14 employees on site working three shifts: 6 AM - 2 PM, 2 PM - 10 PM, and 10 PM - 6 AM. PVS is equipped with facility-wide alarms and sprinkler systems, and fire extinguishers are available throughout the building. The local fire department makes frequent visits to the facility.

PVS' process occurs primarily at its tank farm outside the eastern portion of the facility. Here, PVS receives bulk shipments by rail or truck of ferrous chloride in the form of spent pickle liquor solutions from steel mills. Suppliers include U.S. Steel, Severstal, ArcelorMittal, Ohio Pickle Process, Kenwall, and other ferrous metal processors. Once received, PVS' on-site laboratory tests the solution to ensure it meets specification. The ferrous chloride solution is temporarily stored in one of three 150,000 gallon tanks on the oxidizer pad, a small tank farm on the far east side of the property. A batch of ferrous chloride is first pumped through PVS' indoor filter press at the east side of the building to remove solids and debris. The solution moves to the reduction pad, where scrap metal and mill scale are added for supplemental iron and to reduce the hydrochloric acid content in the solution. A liquid chlorine solution is then added to chemically oxidize the iron in the ferrous chloride into ferric chloride, the final product. The ferric chloride is then further processed as needed into an etchant-grade solution or as a coagulant in water treatment. Etchant-grade ferric chloride is stored in a small indoor tank farm along the north wall of the facility while other ferric chloride is stored in an outdoor tank farm on the northwest corner of the building.

The ferric chloride solution produced by PVS is approximately 37-42% concentrated in a water-based solution. PVS also purchases anhydrous ferric chloride from BASF and repackages it for sale. Most PVS customers, including publically owned treatment works and microelectronics companies, purchase small quantities of ferric chloride, typically a tote or several drums at a times. The large majority of PVS' indoor space is used for product chemical storage, waste storage, and office space. The western half of the facility is leased by PVS Nolwood, another subsidiary of PVS Chemicals, Inc., which uses the space for bulk chemical storage. Another company, Minibulk, leases a small segment of the building to build and refurbish tank systems.

The wastes generated from PVS' processes include tank and railcar cleanout residues, solids and solutions, filter press sludge, sump sludges, aerosol cans, and used oil. Tank and railcar cleanouts occur periodically and the hazardous waste produced is shipped off site immediately afterward, while solids from the cleanout events may be stored on site prior to shipment. These wastes are characterized by PVS as D002 and K062 hazardous waste. Other waste ferrous chloride solutions are characterized as D002, D007 and D008 hazardous waste. Wastes are stored in a dedicated storage area in the center of the warehouse.

Facility Walk-Through

Mr. Wasko started the tour at the indoor filter press which processes incoming ferrous chloride to remove solids from the solution. Mr. Wasko stated the sludges from the press have been characterized as non-hazardous waste.

The tour continued outdoors to the processing tanks on the eastern side of the property. Mr. Wasko pointed out the three tanks on the oxidizer pad which store ferrous chloride and product

ferric chloride. I observed the secondary containment for the tanks and Mr. Wasko pointed out the stormwater sumps for the system. Mr. Wasko then described the production process at the reduction pad, where there were three smaller processing and mixing tanks. There were piles of scrap metal and mill scale in the area that were to be added to the tanks. An operator was using an overhead electromagnet to place scrap metal in the process tank during the tour. Mr. Wasko mentioned the waste sludge that is occasionally generated from tank farm containment cleanouts, both in the oxidizer and reduction tank pads.

The tour continued around the northwest corner of the building to a ferrous and ferric chloride product storage tank farm, where there were eight vertical storage tanks in secondary containment. Some of the tanks in the farm were out of service at the time of the tour. There was no waste observed in the area or in the secondary containment system. Mr. Wasko led the tour through the north entrance of the building to the indoor etchant-grade ferric chloride tank farm. The indoor farm was in secondary containment and no waste was observed in the area.

Mr. Wasko led the tour west through the building to PVS' waste storage area, which occupied the space below several shelving units. Under one shelf was a blue 55-gallon drum of ferrous chloride/soda ash spill debris, a steel 55-gallon drums of aerosol cans, and three orange buckets containing oxidizer pad sump sludge and a mixture of soda ash and battery acid from a spill (See Photos 1 and 2 in Attachment A: Inspection Photographs). Mr. Wasko said PVS had yet to profile the oxidizer pad sump sludge, which was dated from 8/4/14, and the soda ash/battery acid mixture, dated 7/30/14, but that U.S. Ecology would visit PVS soon to take a sample. The drum accumulating waste aerosol cans was not labeled as hazardous waste.

To the right of that waste area was collection of various chemicals, coatings and paints that PVS was looking to dispose of (See Photo 3). Mr. Wasko said U.S. Ecology would also assist PVS in characterizing this material. There was also a small universal waste storage area nearby with two plastic bins holding several battery packs and light bulbs (See Photo 4). The labels on one of the bins was from 2009, while the second bin was not dated. As we left the waste area, I observed a 55-gallon drum accumulating used oil (See Photo 5). The drum was labeled as "Used Oil."

The tour continued into the PVS Nolwood portion of the building where PVS maintains its quality control lab. We spoke briefly to the laboratory manager about the tests that are conducted on incoming ferrous chloride and finished ferric chloride products. Waste ferrous and ferric chloride solutions from the lab are collected in two 55-gallon drums outside the lab entrance. These solutions are placed back into PVS' process through the sump system in the outdoor tank farm that pumps the material into Tank 109 for reprocessing.

Mr. Wasko led the tour through the rest of the facility, including the Minibulk area and the remaining chemical storage areas for PVS Nolwood and PVS. No other waste was observed during the walk-through.

Record Review

I requested the following PVS documents for review:

- Hazardous waste manifests and related land disposal restriction notification forms for the previous three years
- Biennial hazardous waste reports as submitted to MDEQ for the previous three years
- Waste characterization or determination records for PVS' waste streams
- PVS' contingency plan or similar plan
- Personnel training records for the previous three years
- Hazardous waste storage area inspection logs

A diagram of PVS is in Attachment B.

Mr. Wasko provided three years' worth of hazardous waste manifests for review. The most recent manifest was dated 3/20/15 and displays the shipment of one drum of D002 and F003 ferrous chloride fume scrubber bottoms and xylene waste paint, one drum of D002 waste ferrous chloride, and other non-hazardous wastes. Prior to this manifest, PVS had several tanker truck shipments of K062, D002, D007, and D008 hazardous waste ferrous chloride from tank and railcar cleanouts. These shipments occurred on 1/29/15, 11/5/14 and 8/20/14. A lab pack shipment of hazardous waste occurred on 7/31/14 with the following waste codes: U211, U044, D005, D009, D022, U220, U057, D001, D035 and D002. U.S. Ecology is PVS' primary hazardous waste transporter and contractor. All manifests reviewed appeared complete and land disposal restriction notification forms were available. Two manifests from 3/20/15 and 1/29/15 are in Attachment C.

I reviewed waste profiles from Dynecol and U.S. Ecology for the following PVS waste streams: ferrous chloride waste tank bottoms (D002, D007), ferric chloride (D002), ferrous chloride with pickle liquor (D002, K062), waste oil and gas (D018), and non-hazardous waste filter press sludge. A profile for waste aerosol cans was not available and it was unclear if PVS managed the material as hazardous waste, although Mr. Wasko did state that they are disposed by U.S. Ecology. Mr. Wasko said he would determine the waste status of aerosol cans. TCLP results for PVS' filter press sludge are in Attachment D.

I reviewed PVS' Emergency Response Plan ("ERP"), which detailed the emergency response procedures and contacts for the facility. Stephen Wasko was listed as the primary emergency coordinator and his contact information was provided. Section 5 of the ERP detailed PVS' personnel training plans, including training courses such as Hazard Communication, HAZWOPER, hazardous waste, spill cleanup procedures, and emergency response procedures. Mr. Wasko stated that he had recently attended a hazardous waste training event hosted by MDEQ and then provided this training to other PVS employees. He said that prior to 2015, the waste-related training had been through PVS' waste minimization plan. Appendix A of the ERP contained maps and emergency evacuation routes, and Appendix C lists the emergency equipment available on site as well as its location. However, the list does not provide a brief description of the emergency equipment or its capabilities. Mr. Wasko said he would provide an electronic copy of the ERP soon after the inspection.

I reviewed PVS' waste minimization plan which briefly summarizes the wastes generated onsite, as well as procedures to complete a hazardous waste shipment with U.S. Ecology. The plan is available in Attachment E.

Mr. Wasko stated PVS did not maintain hazardous waste storage area inspection logs, but that the waste area is monitored to ensure there are no leaks or spills.

Closing Conference

I summarized my review of the site and potential issues to Mr. Wasko. These issues included the following:

- If PVS manages its aerosol cans as hazardous waste, then the containers accumulating the cans must be labeled as "Hazardous Waste"
- Universal waste container labels should be updated to indicate the actual accumulation start dates
- The ERP list of emergency equipment should contain a brief description of the equipment and its capabilities
- PVS needs to characterize the spill residues that were being stored in the hazardous waste storage area
- PVS is required to conduct hazardous waste storage area inspections and maintain logs of those inspections per Michigan requirements

Mr. Wasko did not claim any information or documents obtained during the inspection as confidential business information.

The inspection ended at approximately 1:30 PM.

Inspection Follow-Up

Later on March 23, Mr. Wasko emailed a copy of a hazardous waste manifest which displayed the shipment of D001 waste aerosol cans and a related land disposal restriction form. He also provided electronic copies of the ERP and its Appendices A-E.

On April 7, 2015, Mr. Wasko emailed an U.S. Ecology laboratory analysis report for the oxidizer pad sump sludge that was observed during the inspection. The report indicates that the material is non-hazardous. These documents are in Attachment F.

Attachments

- A. Inspection Photographs
- B. Facility Diagram
- C. Select Hazardous Waste Manifests
- D. Filter Press Sludge TCLP Report
- E. Waste Minimization Plan
- F. Follow-Up Documents
- G. Inspection Checklist

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ATTACHMENT A: Inspection Photographs
Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

RCRA Photo Log

Photo	Description	Date	Time (CST)	
1	Two 55-gallon drums containing spill residues of ferrous chloride and soda ash and waste aerosol cans, as well as three buckets of oxidizer sump sludge and battery acid spill residues	3/23/15	10:45 AM	
2	A closer view of the buckets in Photo 1	3/23/15	10:46 AM	
3	Various chemicals, paints, and coatings PVS was looking to characterize for disposal	3/23/15	10:46 AM	
4	PVS' universal waste storage area	3/23/15	10:46 AM	
5	A drum accumulating used oil in PVS' waste storage area	3/23/15	10:52 AM	





Photo 2:



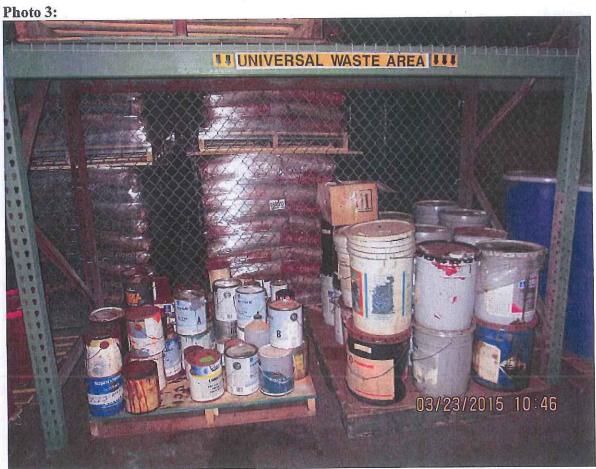


Photo 4:

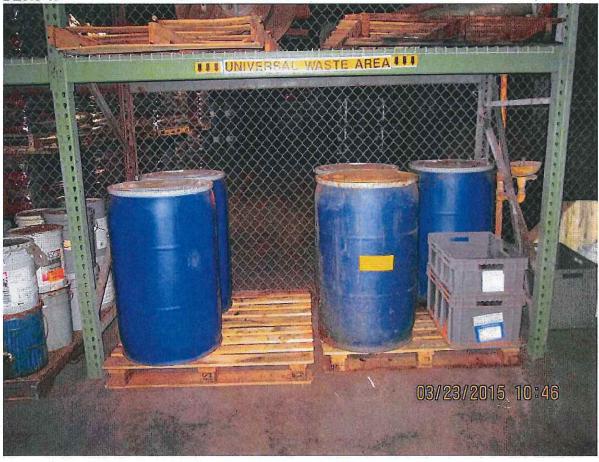
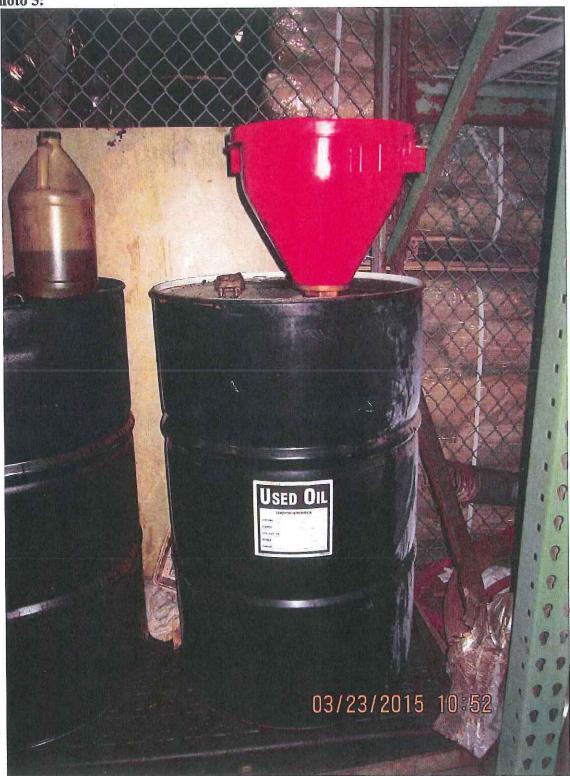


Photo 5:



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ATTACHMENT B: Facility Diagram

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PROPERTY LINE

FERROUS CHLORIDE STORAGE/PROCESSING

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ATTACHMENT C: Selected Hazardous Waste Manifests

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USEcology

SERVICE RECEIPT LOG

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The wastes identified on manifest #

6620 Georgia Detroit, Michigan 48211 (313) 571-7141 MID 074 259 566

and bearing the

LAND DISPOSAL RESTRICTED AND PROHIBITED WASTE NOTICE AND CERTIFICATION

013941218JJK

EPA Hazardous Waste Code(s) listed below are subjected to the land restrictions of 40 CFR Part

268. T	The required	information	applicable to	each waste is identified below:
SEC1	TION 9b			
Ø	8	0	0	The wastes do not meet the treatment standards specified in Part 268 Suppart D or do not meet the prohibitions
1	2	3	4	specified in 268.32 or RCRA Section 3004(d)
٥	Q	0	0	The wastes comply with the treatment standards specified in Part 268 Subpart D and all applicable prohibitions set
1	2	3	4	forth in 268 32 or RCRA Section 3004(d)

Manifest Line Item#	Hazardous Waste Code(s)	Treatability Group		Subcategory (if applicable or "Debris")		Underlying Hazardous Constituents		
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^{*} If Yes- Aitach Table UTS-268.48 Universal treatment standards

I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including a possibility of fine and/or imprisonment.

PVS Technologies

MID 985 621 804

Date

Authorized Signature,

Company Name

EPA ID Number

PLEASE SEND ORIGINAL WITH SHIPMENT -- GENERATOR MUST RETAIN A COPY FOR FILES

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	G	DETROTT MI 48213 enerators Prione: Transporter 1 Company Name	U.S. EPA ID Number							
US ECOLOGY MICHIGAN, INC. MID 074 259 565									59 565	
7. Transporter 2 Company Name U.S. EPAID Number										H1000-7100-100-100-100-100-100-100-100-10
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		and Packing Group (if any))			No.	Туре	Quantity	WL/Vol.	O. 176	asic outes
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Facility's Phone: 18c. Signature of Alternate Facility (or Generator)							Mo	nth Day Year		
18b. Alternate Facility (or Generator) Facility's Phone: 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.								·		
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	-	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials co	overed by the m	anifest exce	ept as noted in Ite	m 18a				
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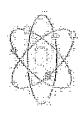
LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

Generator: PVS TECHNOLOGIES	U.S. EPA ID No.: MID985621804
10825 HARPER AVE , DETROIT, MI 48	213
Manifest:	
Page - Line	
1-01 Approval: L148212DET	NWW
Waste Code(s): D002 K062	
Hazardous Constituents: NONE	·
Subcategory(s): D002 - Acidic Subcateg	ory
Certification: THIS RESTRICTED WA	STE REQUIRES TREATMENT TO THE APPLICABLE STANDARD.
This waste must be trea	ed to the applicable performance based treatment standard set forth in 40CFR Part art D, 268.40 or RCRA Section 3004(d) prior to land disposal.
I hereby certify that all information submitted on this knowledge and information.	and all associated documents, is complete and accurate to the best of my
Generator Signature: Sterre, Was	hu The: Plant Manager
Printed Name: Steve Wa	3KD Date: 1/29/15

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ATTACHMENT D: Filter Press Sludge TCLP Report

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Midwest Analytical Services, Inc.

"Where industry somes for answers."

2905 Hilton Rd Ferndale, MI 48220

All test reports include a chain of custody and a cover sheet.

Phone:

(248) 591-6660

MI Only:

(888) 801-4MAS

Fax No:

(248) 591-6668

Date:

21-Jun-13

Client:

Liz Krajcz

Dynecol, Inc.

Order ID:

1306101

MAS Sample #: 130614002

Project ID:

PVS Technologies

Sample I.D.:

170940 Non-Hazardous Filtercake

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request. This test report applies only to the samples received as stated on the Chain of Custody (COC).

Test reports are not complete unless accompanied by the COC and this cover sheet. MAS is not responsible for interpretation of this test report. Please read the following numbered comments carefully.

For your convenience the following legend applies to all the following data sheets:

- 1. Reports shall not be reproduced, except in full, without written approval of MAS.
- 2. N/D=Not detected.
- 3. Results relate only to the items tested.
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight) ppb=parts per billion, ug/l, ug/kg or ug/kg (dry weight)
- 5. QC information on file.
- 6. EQL=Estimated Quantitation Limit.
- 7. N/A=Not Applicable, Not Available.
- 8. Materials listed on the COC were analyzed as requested. See COC for details.
- 9. Data along with qualifiers make this a useable data set.

Additional comments and explanations:

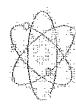
No additional comments

If you have any questions regarding this project feel free to contact me at (248) 591-6660 or (888) 801-4627.

Maria Vojnovic

Lab Manager

Page 1 of 2



Midwest Analytical Services, Inc.

"Where industry comes for answers,"

2905 Hilton Rd Ferndale, MI 48220

All test reports include a chain of custody and a cover sheet.

Test Report

Order ID:

1306101

(248) 591-6660

(888) 801-4MAS

(248) 591-6668

MAS Sample #: 130614002 Date Completed: 6/21/2013

Phone:

MI Only:

Fax No.

PO Number:

150

Detroit, MI 48211-1594
Project ID:

Dynecol, Inc.

6520 Georgia St

PVS Technologies

Sample Identification: 170940 Non-Hazardous Filtercake

Physical Description: Solid

Sample Date/Time:

6/14/2013

Method Number	Parameter	Result	Units	EQL.	Regulatory Limit	Analyst	Date Analyzed	Data Flag
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SW 846 6010B	Barium	1.0 /	mg/L	0.25	100	ΜV	6/19/2013	
SW 846 6010B	Cadmium	N/D	mg/L	0.25	4	MV	6/19/2013	************
SW 846 6010B	Chromium	2.1 7	ing/L	0.13	5	MV	6/19/2013	المتعلميت والمتعاددة
SW 846 6010B	Lead	3,4	mg/L :	0.25	5	MV	6/19/2013	
SW 846 7470A	Mercury	N/D	mg/L	0.002	0.2	MV	6/20/2013	- mary marines de 134
SW 846 6010B	Selenium	סא	mg/L	0.25	1	MV	6/19/2013	***************************************
SW 846 6010B	Silver	N/D	mg/L :	0.13	5	MV	6/19/2013	

pH measured at 20° C

Maria Vinjuine

Maria Vojnovic Lab Manager

Page 2 of 2

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ATTACHMENT E: Waste Minimization Plan

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Document No. DOQU007	PVS Technologies	Page 1 of 3		
Document Title: Waste Minimization Program		Origination Date: 3/8/99	Revision Date: 5/30/14	Revision No.
Approved by- Title Plant Manag		Approved By- initials: AY SW	Draft Review- initials: AY SW	

PURPOSE:

The goal of the Waste Minimization Program at the Detroit Plant is to reduce the volume and toxicity of any hazardous wastes generated on-site to the degree determined by the Detroit Plant to be economically practicable. In addition, the proposed method of treatment or disposal for any hazardous wastes is the practical method currently available, which minimizes the present and future threat to human health and the environment.

POLICY

In accordance with provisions under the Federal Resources Reclamation and Recover Act (RCRA) Section 3002(b), it is the policy of PVS Technologies, Inc. to encourage waste minimization by all employees working at the ferric chloride manufacturing facility which is located at 10825 Harper, Detroit, MI (Detroit Plant").

For waste minimization, the Detroit Plant relies on the following methods (listed in order of preference):

- 1) Source reduction
- 2) Recycling/reuse
- 3) Treatment/disposal

PROGRAM IMPLIMENTATION AND EVALUATION

- A waste minimization review will be conducted yearly to determine the type, amount and frequency of any waste generated on-site.
- Action items which resulted from the evaluation of the waste audits will be presented/assigned to individual employees and/or working teams for discussion and recommendations.
- 3) Recommendations by the individuals and/or teams will be reviewed, prioritized and approved by the Plant Manager (and, if necessary, by Upper Management) for implementation.

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Document No. DOQU007 P	/S Technologies	Page 2 of 3		
Document Title: Waste Minimization Program		Origination Date: 3/8/99	Revision Date: 5/30/14	Revision No.
Approved by- Title: Plant Manager	·	Approved By- initials: AY SW	Draft Review- initials: AY SW	

DESCRIPTION OF PROCESS RESIDUES

Process residues which are typically generated by the Plant consist of the following:

- 1) Process Tank System Inert Residue: This residue is generated from the settling of insoluble/heavy materials, i.e., sand, gravel, etc. and/or of partially dissolved scrap iron. It is generally sludge-like, and may be corrosive with small amounts of heavy metals (typically chromium or lead). It is removed from tanks and shipped off-site for treatment and disposal.
- 2) Non-hazardous filtercake: Ferrous chloride solution is subjected to pressure filtration as it goes to the oxidation process. The inert material which is captured by the filter press is non-hazardous and is shipped off-site for land disposal.
- 3) Alkaline Scrubber Liquid: Periodically, the fume scrubber solution is recharged with fresh materials, i.e., sodium hydroxide, etc. In order to make room for the chemical addition, some scrubbing liquid has to be removed from the scrubber sump. This alkaline liquid is pumped into the reduction process tanks to neutralize hydrochloric acid and is used as a substitute for mill scale.
- 4) Rinse Water from Plant Cleaning Activities: Rinse water is generated from the cleaning of floors, diked areas, truck and rail containment areas, and equipment. It includes runoffs, i.e., rainwater, snow melt, etc. This wastewater is pumped from various floor sumps back into the process for product dilution purposes.
- 5) Used oil: Used oil is generated from the air compressor and from pumps. It is stored in labeled, closed containers which are stored on a containment pallet and are ultimately shipped off-site for recycling and/or disposal.

WASTE STREAMS NOT GENERATED

Maintenance activities on powered industrial vehicles (forklifts, crane, trackmobile) are performed by vendors, and wastes generated by these activities are taken from the site by the vendor.

This facility has no truck fleet; there is no truck maintenance performed at this site.



Document No. DOQU007	PVS Technologies	Page 3 of 3		
Document Title: Waste Minimization Program		Origination Date: 3/8/99	Revision Date: 5/30/14	Revision No.
Approved by- Title Plant Manaç		Approved By- initials:	Draft Review- initials: AY SW	

US ECOLOGY WASTE DISPOSAL PROCEDURE.

- 1. Put in PO for US Ecology
- 2. Notify US Ecology of waste material to be picked up
- 3. If material has not been disposed of before by US Ecology a sample of the material will have to be taken to US Ecology for analysis.
- 4. From the lab analysis a waste characterization will be prepared.
- 5. The waste characterization will be returned to PVS technologies for approval. Review and approve if characterization of waste material is accurate.
- 6. Fax or email Waste Characterization to Us Ecology.
- 7. Arrange for pickup of material.
- 8. US Ecology truck will provide labels for material if it is in drums or totes
- 9 The following paper work will be brought by the driver to be signed by the PVS Technologies employee approving the pickup.
 - a. Uniform Hazardous Waste Manifest. Sign Form and date form. Generators Initial Copy will be left at the plant for the plants records. Drive will also sign from.
 - b. Land Disposal Restricted and Prohibited Waste Notice and Certification. Sign and date form.

Make copy of for plants records

- c. Service Receipt Log. Sign and date form.
- 10. US Ecology will return to plant by mail the following.
 - a. Uniform Hazardous Waste Manifest signed by the Designated Facility Owner or Operator

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Document No. DOQU007	PVS Technologies	Page 4 of 3		
Document Title: Waste Minimization Program		Origination Date: Revision Date: 5/30/14		Revision No.
Approved by- Title Plant Manag		Approved By- initials:	Draft Review- initials: AY SW	

Revision History:
This document was originally issued on at DATE revision 0. It has been revised as follows:

Date	Revision Details	Revision No
5/30/14	Added US Ecology Waste Disposal Procedure	1

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ATTACHMENT F: Follow-Up Documents

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CERTIFICATION FORM

(Submit with waste approval package)

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	0.028	1.4	Į.,	2-Diphenyl hydrazine	0,0	87 <u> </u>	NA	14.7	Personality letty leading	0.4) 7	3	Beryllium	0.82	1.3
10.00	0.0033	0.26	D	italiatos	0.0	17	6.2	N-	Miresonorphaline	0.4			Cadritium		
lotornilino	0.46	16	_ D	ithiocarbumates (total)	0.0	-1-			Nitrosopiperidino	0.01	1 -		Chroquium (Total)	0.69	0.1
robenzene	0.057	6.0		dosilian I	0.0		066		Mitrosopyreolidina	0.01	+			2.77	0.6
obenzi zie.	0.10	NA	-	Mosulfen II	0.02	-	,13			f			Cyznide (Folzi)	1.2	. 59
oro-1,3-lv/gdiene	-	0.28		dorulian sulfate		_		-	emyl .	0,056	f		Cyanido (Amenable)	0.86	3
	0.057	15		iqua igosamati suttere	0.02				zthico	0.014	}		Fluoride*	35	Ŋ
າປະເທດການປ່າສາກ 🕹 🕹	0.27		-1-		0.002	-			al PCB's	0.10		o l	esd	0.69	0,7
•.		6.0	7-	drin zidehydo	0.02	-	.13	Pet	rufaic	0.042	<u></u>	4	Mercury (relet residues)	NA	0.2
octhane			182	TC	0.04	2	1.4	Pen	tachlorebenzene .	0.055	1	77	viercury (all others)	0.15	0.02
octhane d	046	6,0				.1				0,000063	0.00		Vickel	3,98	
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octhana plam d no-m-cresol 0 no-th-thair b	.046 .016		Eth	yl acetate :						# MARKE	000	-1-1-			
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octano plam d prom-cresol 0 procthyl vinyl ether 0 rectus (Rechyl Chlorice) 0 recuphtialens 0, rephenol 0.	0.046 0.018 0.062 0.19 0.055	14 NA 30 5.6 5.7	Eth Bor Eth Eth	ył benzene ył cynnide (Propenenistile) ył ether ył melhacry)ato	0.05 0.24 0.15 0.14	7 4 3 2 1	10 69 60 60	Peni Peni Peni	tschlordibenzo-forms tschlorocituna schloronioratene tschlorophenol	0.055	6.	1 5 0 5 8 S	elenium ilver utlide tatlium	0.82 0.43	0.1
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· USEcologyMichigan

USEcologyMichigan

6520 GEORGIA STREET DETROIT, MICHIGAN 48211 PHONE: (313) 571-7141 FAX: (313) 571-7190

Chen	nist Warnes:	Date:	Code: CAS	Approvat €:	Ordi	er No.: Drum No.:		
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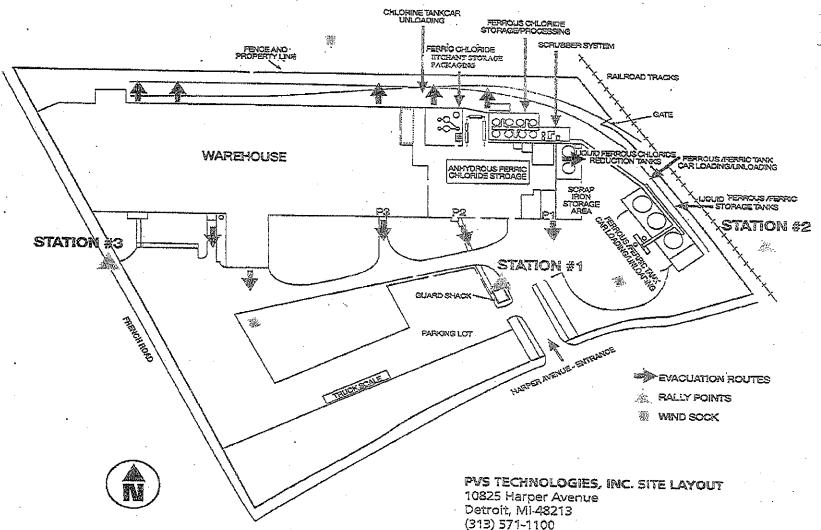
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Document No.	PVS Technologies, Inc			Page 35 of 43
Document Title: Emergency Re		Origination Date: 4/11/02	Revision Date: 9/5/14	Revision No. 9
Approved by-Title Plant Manager	**************************************	Approved By-Initials: AY, SW	Draft Review-Initials: AY	

7.0 APPENDICES

APPENDIX A - MAPS OF THE FACILITY AND EVACUATION PLANS

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Document No. DOQS006	PVS Technologies, Inc			Page 37 of 43
Document Title: Emergency Re	sponse Plan	Origination Date: 4/11/02	Revision Date: 9/5/14	Ravision No. 9
Approved by-Title Plant Manager		Approved By-initials: AY, SW	Draft Review- initials: AY	

APPENDIX C - PERSONNEL PROTECTIVE EQUIPMENT AND EMERGENCY EQUIPMENT LIST

item#	Description	Location	Number
1	SCBA's	cabinet next to boiler room	5
2	Level A suits	cabinet next to boiler room	5
3	Tyvek Suits	maintenance storage area	12
4	Inner gloves	cabinet next to boiler room	100
5	Outer gloves, Neoprene	cabinet next to boiler room	12
6	Boots, Neoprene	cabinet next to boiler room	12
7	Full Face Respirator	maintenance storage area	4
8	Half Face Respirator	maintenance storage area	4
9	Acid Mist /HEPA cartridge	s maintenance storage area	10
11	Harness	Maintenance storage area	3
12	Industrial First Aid Kit	Outside of control room	1
13	Industrial First Aid Kit	Lab	1
14	Chorine C-kit	Railcar station	1
14	Chorine C-kit	maintenace storage area	1
15	Extra Gaskets	In C-kit	2
16	Plastic Shovels	Maintenance Storage area	4
17	Soda Ash	Chemical storage area	1000 lbs
18	Salvage Drums	Maintenance shop	2

See following plant layout for visual locations. The location of the numbers represent the item and its location.

				·	
			4.		
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The Environmental Quality Company Detroit Laboratorp 1923 Frederick Street Detroit, MI 48211-2603

Sample ID: DE07427

LAB SAMPLE RESULTS

Generator:

US Ecology Detroit North

EQ Tracking Number:

489695

Waste Description:

OXIDIZER SUMP DEBRIS

Waste Matrix:

SLUDGE

Report Date:

03/24/2015

(Commence Commence of Commence			#			
Analyt	e Name	Result	Reporting Limit	Regulatory Limit	Units	Analysis Date
рН	No Arrai dia	2.2	0.10		SIUNITS	03/23/2015

TCLP Metals for US Ecology Detroit North

Analyte Name	Result	Reporting Limit	Regulatory Limit	Units	Analysis Date
Arsenic	Less Than	1.0	5	mg/l.	03/20/2015
Barium	2.0	0.5	21	mg/L	03/20/2015
Cadmium	Less Than	0.5	0.11	mg/L	03/20/2015
Chromium	4.3	0.5	0.6	mg/L	03/20/2015
Lead	Less Than	0.5	0.75	mg/L	03/20/2015
Moreury	Less Than	0.25	0.025	mg/L	03/20/2015
Selenium	Less Than	0.5	1	mg/l,	03/20/2015
Silver	Less Than	0.3	0.14	mg/L	03/20/2015

Validated By:

James C Bally

James C. Bahen Lab Supervisor

INTERNAL CHAIN OF CUSTODY - US ECOLOGY DETROIT (SOUTH) LAB -

DE07427 487645

		Po	#
RUSH (circle one)	same day 24 Hr 48 H	lr X Bill Customer:	\$207.00
Generator PVS Tecl	nnologies	Customer #	255
Approval # / Job#		Billing Discrep	ancy Approval:
Waste Common	Oxidizer Sump Debris	Liz Krajcz / Phone: (313	eturn results to: Customer Service 3) 571-7141 x 4532
Please analyze sample	for the following analyses:		-7482 / (313) 571-7190 com /usemcs@usecology.com
Flash / Ignitability x Ph			The state of the s
Pcb's Btex X TCLP metals (8) Total Metals (8) TCLP Volatiles TCLP Semi volatile TCLP Pesticide TCLP Herbicides Reactive cyanide Reactive Sulfide Total Cyanide F-scan X Other (specify): Comments:	detection limit <0.1 ppb		
Number of Containers: 1	Samola Siza: Matriv: limidlehud	ne Sample d	ate: 03/18/15
number or containers, 1	Sample Size: Matrix: liquid/slud	ys sample d	ale. Us for to
Signature: *	- Itygan	Date/Time:	olis-4m
Relinquished:	- 35	Date/Time:	23-15
Recd./Fld Svs: 16	e lan	Date/Time; のろしょう	15

ATTACHMENT G: Inspection Checklist

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Department of Environmental Quality FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name PVS Technologies			Part 3	Rules
Date 3/23/2015 ID# MID	1985121804		1994 F	A 451
HAZARDOUS WASTE AND WASTE #	SOURCE	Н	OW MUCH	
			N	- 1
abbreviated FACILITY COMPLI	ANCE REQUIRED IN ALL AREAS			
	NATION (Rule 302: 40 CFR 262.11		YES NO	
(NI = Not inspected; N/A = Not applicable)1. Determined if waste streams are hazardous waste? (Rule 302:	40 CFR 262.11)) Saveal will want out	262A	LIV	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40		262D	M	NI N/A
b) re-evaluated waste when changes in materials or process?	a so the same of t	262A	14	NI N/A
Did generator have written waste analysis plan if treating waste		262C		NINIA
	UMBER (Rule 303: 40 CFR 262.12)			
3. Has the generator obtained an identification number? (Rule 303	3: 40 CFR 262.12)	262A	<u>M_</u>	NI N/
MANIFEST REQUIRE	MENTS (Rule 304: 40 CFR 262.20)			
4. Copies of the manifest readily available for review & inspection		FSS	W_	NI N/
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.	20(a))	262D	M	NI N/A
6. Manifests, prepared by the generator according to instructions	in appendix of Part 262 contain the following:		-	
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20	O(a)(i)),	262B	M	NI N/
b) generator's name, address, phone & ID # (Rule 304(1)(b):	40 CFR 262.20(a)(i)),	262B	M_	NI N/
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 26	2.20(a)(i)),	262B	M_	NI N/
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 26	62.20(a)(i)),	262B	M _	NI N/
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262	20(a)(i)),	262B	W_	NI N/
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 4	0 CFR 262.20(a)(i)),	262B	M _	NI N/
g) hazardous waste number of the wastes. (Rule 304(1)(b): 46	CFR 262.20(a)(i)),	262B	M_	NI N/
h) generator signature, initial transporter & date of acceptance	e. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	\square	NI N/
7. NOT APPLICABLE				
For out-of-state manifests, if not submitted by designated facilit requested by Director? (Rule 304(2)(c))	y, generator submitted copy of 3 rd signature manifest as	262B	_را_	NI W
9. Is the transporter used properly registered &/or permitted unde	r Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<u>M_</u>	NI N/
NOTE: For shipments of hazardous waste solely by water or rail s	hipments, within United States see Rule 304(4)(g or h).		23	7
10. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 26:	2.20)	262B	_ 🗹	NI N/
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).				
a) number of manifests generator HASN'T receive signed co	py from TSD w/in 35 days:			
b) number of manifests generator HASN'T submitted exception	on reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/toxicity/recycle v	vastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	<u>M_</u>	NI N
1			/	
13. Facility discusses program in place to reduce volume/toxicity/r	recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	IV	NI N/

LAND DISPOSAL RESTRICTION REQUIREMENTS YES NO WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7)) 14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1)) 268A NI N/A a) all listed waste 268A NI N/A b) all characteristic wastes? NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b)) 15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? NI N/A 268A (Rule 311(1):40 CFR 268.7(a)(2)) 16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial NI N/A shipment? (Rule 311(1): (40 CFR 268.7(a)(3)) OR 17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with NI(N/A 268A initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4)) 18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, 268A NI NIA did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9)) 19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3) 268A NI N/A a) EPA hazardous waste #? 268A NI N/A b) if wastewater or non-wastewater as defined in 268.2(d&f)? 268A NI N/A c) subcategory of the waste (such as D003 reactive cyanide) if applicable? 268A NI N/A manifest number associated with the shipment? 268A NI N/A waste analysis data, where available? waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268A NI N/A 268.40 for the waste code under regulated constituents) UNLESS g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator 268A NI N/A indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9) did generator/freater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS 268A NI(N/A) standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48) 20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3) 268A NI NA a) if the notice is for shipments that meet the standards does the notice include the certification? if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't NINA 268A prohibited from land disposal & date the waste is subject to prohibition? NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44) NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45." 21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6) 268A NI N/A If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7)) 268A NI NIA 268A NI N/A 23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8) NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste. DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3) NI N/A 24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a)) 268A TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40) 25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c)) 268A NI NIA BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))

NI N/A

NI N/A

262D

262D

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)		YES N	9
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said_	obsrvd_ NI N/A
 Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a)) 	262C	co.said_	obsrvd_ NI N/A
 On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b)) 	262C	co.said_	obsrvd_ NI N/A
31. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	M_	NI N/A
ACCUMULATION TIME (Rule 306: 40 CFR 262.34)			
	on-site		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	[_]_	NI (N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	f 1	NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	[]	NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C] NI N/A
OR		7 1	
e) one of the following apply:	3 1		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[]	NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C		NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	LJ_	_ NI N//
 iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii a (Rule 306(9-10):40 CFR 262.34(i)) 	bove? 262C	ப_	_ NI N/
The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and	1 40 CFR 262	2.34(a)(1).
f) are containers in good condition? (265.171)	262C		NI N/A
g) are containers compatible with waste in them (265.172)	262C	<u>L</u>	NI NA
h) are containers stored closed? (265.173(a))	262C	<u>LJ_</u>	NI NA
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C		J NI N/A
ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local prevention code authority for less than 15 meter? (265.176)	al fire 262C		NI NA
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[1	NI NIA
I) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	LL	NI NIA
m) Inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i)) No records maintained	262C		NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	M_	NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C		NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177	(c)) 262C	<u> </u>	_ NI N/A
Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265	5.173(a).		
33. If hazardous waste is being accumulated at the point of generation:			
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	راا	NI (N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[<u>\</u>	NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii)) Aerosol Can	dry 2620	LJV	NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C		NI N/A
e) are container(s) in good condition? (265.171)	? 262C	W/	NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	M_	_ NI N//
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	M_	_ NI N//
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste	e:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2)	2)) 262 C	: LJ_	_ (NI) N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	<u> </u>	_ NIDNI
Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.			
35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area			
a) impervious base free of cracks? (264.175(b)(1)):	2620	:	_ NI (N/

					1
b) sloped or otherwise designed to elevate/protect	containers from contact with liquids? (264.175(b)(2))	262C	LJ_	NI	N/A
c) hold 10% of volume of containers or volume of t	he largest container, whichever is greater? (264.175(b)(3))	262C	L1_	_ NI	N/A
d) run-on prevented unless sufficient capacity? (26	34.175(b)(4))	262C	<u>LJ_</u>	_ NI	N/A
e) accumulated liquids removed in a timely manner	r to prevent overflow? (264.175(b)5))	262C	<u></u>	_ NI	NIA
NOTE: Closure of Accumulation Area covered under # 5	53.				V
	F023, F026, F027), is haz waste accumulation area sloped or wise protected from contact with liquids? (264.175(c)(1 & 2))	262C	W	NI	N/A
37. Is hazardous waste accumulated in other than tanks not accumulated, i.e.: process tank?	s or containers? Or, is hazardous waste generated but Explain any yes answer.			NI	N/A
38. Waste area protected from weather, fire, physical da	amage & vandals? (Rule 306(1)(e))	262C	<u></u>	_ NI	N/A
	ste or hazardous waste constituent can escape by gravity aters, drains or sewers, and such that fugitive emissions	262C	<u></u>	NI	N/A
40. Is hazardous waste accumulated in tanks?	If so, complete Tank System inspection form.			NI	N/A
41. Is hazardous waste placed on drip pads?	If so, complete Wood Preserving inspection form	7		NI	N/A
Rule 306((1)(d) & 40 CFR 262.34(a)(4) refers to 265.16 PERSONNEL TRAINING (265.16)				35
42. Did personnel receive training? (265.16)		262C	<u></u>	_NI	N/A
43. Do personnel training records contain the following:	8		7)	
a) job title? (265.16(d)(1))		262C	4_	NI	N/A
b) job descriptions? (265.16(d)(2))		262C	Ш_	NI	N/A
c) name of employee filling each job? (265.16(d)(1))	262C	<u>U</u> _	NI	N/A
d) description of type & amount of both introductory	/ & continued training? 265.16(d)(3))	262C	<u></u>	NI	N/A
e) training designed so facility personnel can respon	nd to emergencies? (265.16(a)(3)	262C	L J_	NI	N/A
f) records of training? (265.16(d)(4))	a II	262C	ш_	NI	N/A
g) do new personnel receive required training within	n 6 months? (265.16(b)	262C	<u></u>	NI	N/A
h) do training records show personnel have taken p	part in annual training? (265.16(c))	262C	<u>L</u>	NI	N/A
i) training by person trained in hazardous waste ma	anagement procedures? (265.16(a))	262C	LU.	NI I	N/A
Rule 306(1)(d) & 40 C	CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.	и		¥	
	of fire, explosion, release of hazardous waste or hazardous waste	262C	co.said_		I_ N/A
45. If required, does this facility have the following:			1		
 a) internal communications or alarm systems? (265) 	i.32(a))	262C		NI I	N/A
b) telephone or 2-way radios at the scene of operat		262C	\square	NI I	N/A
 c) portable fire extinguishers, fire control, spill contr 	ol equipment and decontamination equipment? (265.32(c))	262C	<u></u>	NI I	N/A
d) adequate volume of water and/or foam available	for fire control? (265.32(d))	262C	\square	NI I	N/A
46. Testing and Maintenance of Emergency Equipment			1		
a) owner/operator test & maintain emergency equip	oment to assure operation? (265.33)	262C	\square _	NI	N/A
b) has owner/operator provided immediate access	to internal alarms? Access to alarm system is applicable only if red	quired (40 CFR 2	265. 3	(2)
i) when hazardous waste is being poured, mixe	d, etc. (265.34(a))	262C	M_	NI I	N/A
ii) if only one employee on the premises while fa	cility is operating. (265.34(b))	262C	4	NI I	N/A
c) aisle space for unobstructed movement of person	nnel/emergency equipment? (265.35)	262C	M	NI I	N/A
47. Has the facility made arrangements with local author	ities? (265.37(a)&(b))	262C	<u> </u>	NI I	N/A
Rule 306(1)(d) & 40	O CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56. N AND EMERGENCY PROCEDURES (265.50-265.56)		/		
	ould threaten human health or the environment? (265.51(b))	262C	<u></u>	NI	N/A
49. Does the contingency plan contain the following:				X I	
a) actions personnel must take responding to fires/e	explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	\checkmark _	. NI	N/A
 describe arrangements w/ local police, fire, hosp emergency services; (265.52(c)) & (265.37(a)&(b) 	itals, contractors, state & local emergency responders for b))?	262C	1/	NI	N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	M_	NI	N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	LJY	NI	N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	W_	NI	N/A
Does the facility have an Emergency Coordinator? (265.55)	262C	M_	NI	N/A
Emergency Coordinator and Emergency Procedures:		-		
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	M	. NI	N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	1/	NI	NIA
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	M_	ŇI	N/A
 d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environm or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d)) 	nent 262C		NI/	N/A
1. Contingency plan Amendments and Copies		/		
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	M	_ NI	N/
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	<u>\\</u> _	_ NI	N/
Rule 309 refers to 262, Subpart E except 262.54 & 262.55 INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)			+II	
2. Has the facility imported or exported hazardous waste?			_ NI	N/
a) exporting, has the generator:		Y.		_
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	<u>LJ_</u>	_ NL	KI.
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	ப_	_ NI	N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	<u></u>	_ NI/	N//
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	<u></u>	_ NI	N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	<u>L</u>	_ NI	N/
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[_]_	N	N/
ACCUMULATION AREA CLOSURE (265.111 & 265.114) 73. The accumulation area must be closed in a manner that:	2000	1		
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	Ш_	_ NI	NJ
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C 262C	<u></u>	_ NI	N/
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	2020	<u></u>	_ IVI	N
COMMENTS:				
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